

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
:   
Cincearae Kelly : No. 22-11030-MDC  
Debtor :

ANSWER TO MOTION OF WILMINGTON TRUST, NATIONAL ASSOCIATION, AS  
SUCCESSION TRUSTEE TO CITIBANK, N.A.  
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362  
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied for lack of specific proof.
7. Admitted.
8. Denied.
9. Denied.
10. Denied because Debtor is being offered assistance to  
fully catch up her mortgage.
11. No objection.
12. Admitted.

WHEREFORE Debtor respectfully requests this Honorable Court  
deny Movant's Motion for Relief.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 07/25/2022

A copy of this Answer is being served on Rebecca A. Solarz,  
Esquire, and the Chapter 13 Trustee.